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Chip-Tech, Ltd. and Dependable Component Supply Corp.*

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHIP-TECH, LTD.,

Plaintiff, and on behalf of all
others similarly situated,

v.

PANASONIC CORPORATION., et al.,

Defendants.

Case No. 4:14-cv-03264-JD

**PLAINTIFFS' ADMINISTRATIVE MOTION
TO CONSIDER WHETHER CASES SHOULD
BE RELATED PURSUANT TO CIVIL L.R. 3-
12 AND 7-11**

DEPENDABLE COMPONENT SUPPLY CORP.,

Plaintiff, and on behalf of all
others similarly situated,

v.

PANASONIC CORPORATION., et al.,

Defendants.

Case No. 3:14-cv-03300-VC

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Civil Local Rules 3-12 and 7-11, Plaintiffs Chip-Tech, Ltd. and Dependable Component Supply Corp. submit this administrative motion to consider whether *Dependable Component Supply Corp. v. Panasonic Corporation, et al.*, Case No. 3:14-cv-

03300-VC (the “*Dependable* Action”), filed in this District on July 22, 2014, should be related to *Chip-Tech, Ltd. v. Panasonic Corporation, et al.*, Case No. 4:14-cv-03264-JD (the “*Chip-Tech* Action”), which was filed in this District on July 18, 2014.

Civil Local Rule 3-12(a) provides that actions are related when (1) the actions concern substantially the same parties, property, transaction or event; and (2) it appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different judges.

The *Chip-Tech* Action and the *Dependable* Action readily satisfy the above requirements. Both cases involve the same parties, transactions, and events. Plaintiffs in each action seek class treatment of their federal law antitrust damages claims—brought on behalf of direct purchasers of aluminum and tantalum electrolytic capacitors—alleging that Defendants engaged in a conspiracy and took action to fix, raise, maintain or stabilize prices in the market for these types of electrolytic capacitors. The *Chip-Tech* Action and the *Dependable* Action make the same allegations arising from the same conduct by the same Defendants. Thus, each action will require adjudication of substantially the same questions of law and fact.

Accordingly, separating these actions would likely create an unduly burdensome duplication of labor and expenses and potentially lead to conflicting results. Relating these actions, on the other hand, would conserve judicial resources and ensure consistent results. The parties and the Court will benefit from these efficiencies should the Court administratively relate these actions.

Plaintiffs respectfully request that the *Dependable* Action and the *Chip-Tech* Action be related.

Dated: July 29 , 2014

JOSEPH SAVERI LAW FIRM, INC.

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